DOCKET FILE COPY ORIGINAL

DOCKET FILE COPY ORIGINAL

frontier

Michael J. Shortley, III
Senior Attorney and Director
Regulatory Services

180 South Clinton Avenue
Rochester, NY 14646
716-777-1028
716-546-7823 fax
716-777-6105

mshortle@frontiercorp.com

May 22, 1998

BY OVERNIGHT MAIL

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: CC Docket No. 96-115
Petition for Reconsideration

Dear Ms. Salas:

Enclosed for filing please find an original plus eleven (11) copies of the Petition for Reconsideration filed on behalf of Frontier Corporation of the Commission's Second Report and Order in the above-docketed proceeding.

To acknowledge receipt, please affix an appropriate notation to the copy of this letter provided herewith for that purpose and return same to the undersigned in the enclosed, self-addressed envelope.

Very truly yours,

Michael J. Shortley, III

cc: International Transcription Service

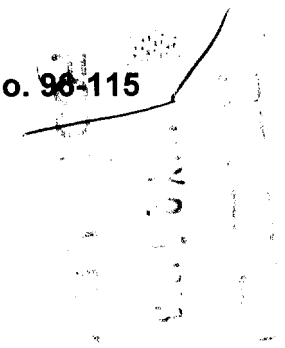
No. of Copies rec'd 0+11
List A B C D E

15538.1

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the	)	**CC Docket No. 96-115**
Telecommunications Act of 1996:	)	
	)	
Telecommunications Carriers' Use	)	
of Customer Proprietary Network	)	
Information and Other	)	
Customer Information	)	
	)	
Implementation of the Non-Accounting	)	**CC Docket No. 96-149**
Safeguards of Sections 271 and 272	)	
of the Communications Act of	)	
1934, as Amended	)	



PETITION FOR RECONSIDERATION

Michael J. Shortley, III

Attorney for Frontier Corporation

180 South Clinton Avenue
Rochester, New York 14646
(716) 777-1028

May 22, 1998

Table of Contents

Summary

Frontier submits this petition for reconsideration of limited aspects of the rules adopted by the Commission to implement section 222 of the Communications Act. The Commission should reconsider and alter four aspects of the CPNI rules that it has adopted.

First, the Commission should delete the requirement that carriers electronically track the "purpose" for which carrier personnel access CPNI. The costs that retention of this rule would engender far outweigh any potential benefits, a fact that the Commission may not have appreciated.

Second, the Commission should eliminate the requirement that the solicitation of customers be contained in the same communication as the notice advising customers of their CPNI rights. The Commission adopted this rule with virtually no discussion and it conflicts with the Commission's clearly-stated expectation that carriers will (or, at least, may) engage in multiple solicitations of customers' consent to use their CPNI outside the context of the total service package. It is also inconsistent with accepted business practices and assumes that customers expect no continuing relationship with their carrier.

Third, the Commission should remove the prohibition on the use of CPNI for "win-back" purposes. Section 222 does not compel this restriction and it is unnecessary in any event. The Commission, however, must continue to assure itself that carriers -- particularly, the largest incumbent local exchange carriers -- are not misusing customer information of their competitors.

Fourth, particularly in the context of CMRS, the Commission should reconsider its exclusion of CPE from the CMRS basket. Whatever may be the case with respect to wireline services, customers view CPE as part and parcel of their wireless services. CPE has traditionally been subsidized by CMRS providers. Customers have come to expect that CPE will be closely associated with their wireless services. Prior Commission decisions recognize this market reality.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Telecommunications Act of 1996:	)	**CC Docket No. 96-115**
	)	
Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information	)	
	)	
Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as Amended	)	**CC Docket No. 96-149**

PETITION FOR RECONSIDERATION

Introduction

Frontier Corporation ("Frontier"), on behalf of its incumbent local exchange, competitive local exchange, interexchange and wireless subsidiaries and affiliates, submits this petition for reconsideration of limited aspects of the rules adopted by the Commission to implement section 222 of the Communications Act.[1] Frontier generally concurs in the arguments advanced by the Cellular Telecommunications Industry Association and GTE in their respective motions for stay or clarification. Regardless of the Commission's disposition of those requests, however, the Commission should

---

[1] *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, CC Dkt. 96-115, Second Report and Order and Further Notice of Proposed Rulemaking, FCC 98-27 (Feb. 26, 1998) ("Second Report"). A summary of the Second Report was published in the Federal Register on April 24, 1998.

See 47 C.F.R. §§ 64.2001 *et seq.*

reconsider and alter four aspects of the customer proprietary network information ("CPNI") rules that it has adopted.

First, the Commission should delete the requirement that carriers electronically track the "purpose" for which carrier personnel access CPNI.[2] The costs that retention of this rule would engender far outweigh any potential benefits, a fact that the Commission may not have appreciated.

Second, the Commission should eliminate the requirement that the solicitation of customers be contained in the same communication as the notice advising customers of their CPNI rights.[3] The Commission adopted this rule with virtually no discussion[4] and it conflicts with the Commission's clearly-stated expectation that carriers will (or, at least, may) engage in multiple solicitations of customers' consent to use their CPNI outside the context of the total service package. It is also inconsistent with accepted business practices, and assumes that customers expect no continuing relationship with their carrier.

Third, the Commission should remove the prohibition on the use of CPNI for "win-back" purposes.[5] Section 222 does not compel this restriction and it is unnecessary in any event. The Commission, however, must continue to assure itself that carriers -- particularly, the largest incumbent local exchange carriers -- are not misusing customer information of their competitors.

---

2 47 C.F.R. § 64.2009(c).

3 47 C.F.R. § 64.2007(f)(4).

4 *See* Second Report, ¶ 141.

5 47 C.F.R. § 64.2005(b)(3).

Fourth, particularly in the context of commercial mobile radio services ("CMRS'), the Commission should reconsider its exclusion of customer premises equipment ("CPE") from the CMRS basket.[6] Whatever may be the case with respect to wireline services, customers view CPE as part and parcel of their wireless services. CPE has traditionally been subsidized by CMRS providers. Customers have come to expect that CPE will be closely associated with their wireless services. Prior Commission decisions recognize this market reality.

Argument

I. THE COMMISSION SHOULD ELIMINATE ITS REQUIREMENT THAT CARRIERS ELECTRONICALLY MONITOR THE PURPOSE FOR WHICH CARRIER PERSONNEL ACCESS CPNI.

The Commission correctly decided to pursue a use, rather than an access, restriction on CPNI.[7] The Commission also developed a series of electronic monitoring rules that, based upon its *Computer III* requirements, it expected would not be overly expensive to implement.[8]

While this may be true for the largest exchange carriers that were already subject to the *Commission's Computer III* requirements[9] -- and that have *already* incurred many of these costs -- it is likely not true for other carriers, such as Frontier.[10]

---

6 47 C.F.R. § 64.2005(b)(1).

7 *See* Second Report, ¶¶ 195-98.

8 *Id.*, ¶¶ 197-98.

9 Indeed, the comments that the Commission cites in support of this proposition came almost exclusively from such carriers. See *id.* ¶ 197 n.687.

10 The Commission -- by granting carriers an eight month transition period to implement the necessary system modifications (*id.*, ¶ 202) and by offering carriers an opportunity to

Nonetheless, Frontier is prepared to implement the requirements that it establish a CPNI flag within the first few lines of the first screen and count the times that CPNI is accessed. The requirement that it also monitor the purposes for which CPNI is accessed, however, is likely unnecessarily burdensome.

Although Frontier has not completed its estimates of the time and expense that it could incur to complete the systems changes necessary to comply with the Commission's requirements, it believes that this effort would take several months and cost a substantial amount of money. Moreover, actually complying with the requirement on an ongoing basis is necessarily labor-intensive, requiring individualized entry *each* time a carrier employee accesses a customer's CPNI. Frontier's sales and customer service representatives access customer records hundreds of thousands, if not millions, of times per year. And this figure does not include the times that such information is accessed by installation, repair, marketing, legal and regulatory representatives for reasons that are totally unrelated to marketing services to individual customers by utilizing those customers' CPNI. This rule would be expensive and burdensome to implement, and, in an environment of rapid change, it may prove to be transitional at best. No business can justify the expenditure independently. Moreover, since the Commission has accepted the "total service" view of the market, the logical outgrowth is that these costs *are* transitional.

---

seek waivers based upon individual circumstances (*id.*, ¶ 194) -- at least implicitly recognizes this fact.

It is overbroad in any event. The Commission has also adopted a variety of disclosure, training, approval and certification rules to ensure compliance with its CPNI requirements.[11] By eliminating this one requirement, the Commission will not lose the ability to audit carrier compliance with section 222 or otherwise ensure that carriers comply with its regulations. Comparing the time and expense that would be required to comply with this requirement with the relatively minor benefits that its retention would engender,[12] the Commission should rescind it.

II. THE COMMISSION SHOULD ELIMINATE ITS APPARENT REQUIREMENT THAT CARRIERS COMBINE CPNI NOTIFICATION AND SOLICITATION IN THE SAME CORRESPONDENCE.

The Commission has adopted a rule that requires carriers to combine written notifications of customers of their CPNI rights with written solicitations for the customer's approval of the use of CPNI.[13] The Commission did not justify this requirement. It merely stated that:

> Similarly, the solicitation for approval, if written, should *not* be on a document separate from the notification, even if such document is included within the same envelope or package.[14]

Frontier believes that this is an error which the Commission may correct by an appropriate *erratum*. The Commission indicated elsewhere in the order: the notification

---

11 *See* 47 C.F.R. § 2009.

12 When the Commission is considering rules that require major modifications to IT systems, it needs to keep in mind that this is 1998. Carriers -- including Frontier -- are involved in major Year 2000 efforts. These should be at the forefront of IT development efforts. The Commission should be loathe to adopt rules that deflect focus from Year 2000 projects.

13 47 C.F.R. § 64.2007(f)(4).

14 Second Report, ¶ 41 (emphasis added).

must be *prior* to any solicitation for approval;[15] carriers are required to provide only a one-time notification of customers' CPNI rights;[16] and carriers may solicit customers multiple times.[17]

In this context, Frontier believes that the Commission's requirement is simply an error. If the Commission meant to say that, *if* the solicitation *and* notification are contained in the same document, then the notification must come first,[18] Frontier has no objection. Otherwise, the Commission should correct this apparent error, which is simply inconsistent with the balance of the Commission's discussion on this subject.

If, however, the adoption of this rule was not an oversight on the part of the Commission, then the Commission should reconsider and rescind it. As described above,[19] this rule is not reconcilable with other Commission expectations. Nor does it make sense to permit carriers to divorce oral and electronic notifications from solicitations, but not to do so with respect to written notifications and solicitations. So long as the notice precedes the solicitation and is proximate in time to any solicitation -- which the rules already require[20] -- it should make no difference that written notifications and solicitations are in different packages. By the time any written solicitation is made, customers will have already been informed -- and presumably are aware -- of their

---

15 *Id.*, ¶ 140.

16 *Id.*, ¶ 141.

17 *Id.*, ¶ 117.

18 *See id.* ¶ 141.

19 *See supra* at 5-6.

20 *See* 47 C.F.R. §§ 64.2207(f), (f)(3).

CPNI rights. Finally, customers will be unhappy with transactions in which repetitive notices will be provided in order to procure other services.

Moreover, the rule, as presently crafted, is counterproductive. It may create incentives for carriers to rely upon oral, rather than written, notifications and solicitations as to which there is no similar restriction. Yet, the rules recognize that oral communications are less reliable or auditable than written communications.[21] The Commission should eliminate this anomaly.

III. THE COMMISSION SHOULD PERMIT THE USE OF CPNI TO "WIN-BACK" CUSTOMERS.

Section 64.2005(b)(3) prohibits the use of CPNI to attempt to regain a former customer's business.[22] The Commission justifies this requirement, in part, on the basis of anticompetitive potential.[23] Although the Commission is correct to express concern regarding potential anticompetitive abuse -- and should take action to address it, particularly with respect to activities in which the largest incumbent local exchange carriers may engage -- the rule as crafted is overbroad.

In the first instance, it is inconsistent with the rules that permit carriers to utilize CPNI for the purpose of selling additional services within the customer's total service package. To the extent that the Commission is correct that customers expect -- and the statute permits -- carriers to utilize CPNI to sell additional services within the customer's

---

21 *See* 47 C.F.R. § 64.2007(b).

22 47 C.F.R. § 64.2005(b)(3).

23 *See* Second Report, ¶ 85 n.316,

total service package,[24] then it certainly follows that customers expect carriers to utilize their CPNI to attempt to retain their existing business.

Nor is the use of CPNI in a "win-back" context inconsistent with the language of the statute. Section 222(c)(1)(A) permits the use of CPNI in connection with "the telecommunications service from which the information is derived."[25] In this context, a carrier that is attempting to retain a customer is utilizing CPNI in a manner envisioned by the statute -- namely, the continued provision of a telecommunications service. Thus, contrary to the Commission's conclusion,[26] this use of CPNI falls within the total service relationship. In many cases, the relationship has not yet entirely been severed. Moreover, with the prevalence of slamming, it is entirely possible that, although the carrier may perceive that the customer has left or is about to leave, the customer has authorized no such change.

In addition, such information may be particularly useful in assisting carriers to win-back their customers. It would certainly assist a carrier in designing -- to the extent permitted -- a package of service offerings that could better meet that customer's needs or be tailored more precisely to a competitor's offerings. Win-back provides a form of comparison shopping for the customer -- a direct comparative offer that can serve the customer's interest.

---

24 *See id.*, ¶ 24.

Although Frontier is not challenging, on reconsideration, this aspect of the Commission's decision, it believes that the Commission's view of customer expectations is unduly narrow.

25 47 U.S.C. § 222(c)(1)(A).

26 Second Report, ¶ 85.

Nonetheless, should the Commission rescind this rule, it must ensure that carriers with market power -- particularly, the largest incumbent local exchange carriers -- do not abuse the carrier-to-carrier relationship with their competitors unfairly to win-back customers.[27] Thus, if the Commission rescinds this rule as Frontier suggests, it should flatly prohibit incumbent local exchange carriers from utilizing information (whether or not classified as CPNI) derived solely from their status as providing carrier-to-carrier services to their competitors in win-back efforts.

Section 64.2005(b)(2) prohibits the use of CPNI "to identify or track customers that call competing service providers." That rule is fine, as far as it goes. However, in the case of incumbent local exchange carriers, it does not go far enough. The Commission should prohibit the use of *any* information derived solely from the provision of carrier-to-carrier services in win-back campaigns, particularly when an incumbent local exchange carrier establishes "win-back" programs that appear to be able to be successful solely because of the use of this information.

This is not to say that incumbent local exchange carriers should not be afforded the opportunity to retain their customers. However, the Commission must remain cognizant of their economic and regulatory status as dominant carriers.[28] Frontier's

---

27 In the emerging arena of local exchange competition, competitive local exchange carriers -- either of the resale or facilities-based variety -- are critically dependent upon the incumbent local exchange carriers for the facilities and services that they need to serve their customers in competition with incumbent local exchange carriers.

28 Although the Commission has generally eschewed in this proceeding adopting regulations that differentiate between dominant and non-dominant carriers, it would be justified in doing so in this instance. Section 222 -- which generally does not create such a distinction -- does not require the result that the Commission reaches in this context. Thus, the Commission would be fully justified in making such a distinction here.

competitive local exchange companies have already experienced such problems, where certain local exchange carriers have come close (if not crossed the line) to disparaging Frontier in order to retain customers. In a market that is not yet characterized by effective competition, the Commission needs to discourage this type of behavior.

Permitting carriers to use CPNI to engage in win-back is consistent with section 222 and otherwise makes sense. In the context of incumbent local exchange carriers, however, the Commission needs to provide additional protections. In this regard, Frontier suggests that the Commission modify section 64.2005(b)(2) of its rules by adding:

> An incumbent local exchange carrier may not use information derived solely from the provision of carrier-to-carrier services, including the identity of the competitor, to regain the business of the customer who has switched to another service provider.

IV. THE COMMISSION SHOULD MODIFY ITS RULES THAT DIVORCE CMRS SERVICE FROM CPE.

The Commission has apparently adopted a rule that precludes CMRS providers from using customers' CPNI to market CPE.[29] Unlike the situation on the wireless side -- where the Commission had previously applied structural separation rules to the largest carriers' provision of landline service and CPE -- the Commission explicitly

---

[29] 47 C.F.R. § 64.2005(b)(1).

With respect to CMRS providers, the rule is quite unclear. The Commission defines CPE as equipment "employed on the premise of a person" (47 C.F.R. § 64.2003(d)). It is hard to describe a wireless phone, which is typically in a car, briefcase, pocketbook or hooked on a belt of a person as being located on a person's premises.

rejected such a regime for cellular providers. Indeed, wireless carriers have historically heavily subsidized cellular equipment to obtain new cellular customers. At least in the wireless industry, there has been little, if any, customer distinction between service and equipment in terms of what customers expect.

Frontier acknowledges that, with respect to new customers this is not an issue, as a carrier such as Frontier Cellular would possess no CPNI. It is a distinct issue with respect to existing customers to whom Frontier Cellular wants to market new services. For example, Frontier Cellular is in the process of upgrading its wireless network to offer digital service. Obviously, a customer cannot subscribe to digital cellular service without also possessing a digital-capable cellular telephone. In order effectively to target customers for digital service, their CPNI is particularly useful. Precluding the use of CPNI to target existing analog customers to upgrade their service to digital would be an unnecessary handicap.

At least with respect to the CMRS industry, the Commission should modify its rule to include service and equipment in the customer's total service package.

Conclusion

For the foregoing reasons, the Commission should reconsider limited portions of its Second Report in this proceeding and, upon reconsideration, act in the manner suggested herein.

Respectfully submitted,

Michael J. Shortley, III

Attorney for Frontier Corporation

180 South Clinton Avenue
Rochester, New York 14646
(716) 777-1028

May 22, 1998

Certificate of Service

I hereby certify that, on this 22nd day of May, 1998, copies of the foregoing Petition for Reconsideration were served by first-class mail, postage prepaid, upon the parties on the attached service list.

Michael J. Shortley, III

MARK J GOLDEN
VICE PRESIDENT OF INDUSTRY AFFAIRS
PERSONAL COMMUNICATIONS
INDUSTRY ASSOCIATION
500 MONTGOMERY STREET
SUITE 700
ALEXANDRIA VA 22314-1561

JONATHAN E CANIS
REED SMITH SHAW & MCCLAY
1301 K STREET NW
SUITE 1100 EAST TOWER
WASHINGTON DC 20005

GTE SERVICE CORPORATION
GAIL L POLIVY
1850 M STREET NW
WASHINGTON DC 20036

GTE SERVICE CORPORATION
RICHARD MCKENNA
600 HIDDEN RIDGE
IRVING TEXAS 75015

CABLE & WIRELESS INC
ANN P MORTON
8219 LEESBURG PIKE
VIENNA VIRGINIA 22182

TELEPORT COMMUNICATIONS GROUP INC
TERESA MARRERO
SENIOR REGULATORY COUNSEL
ONE TELEPORT DRIVE SUITE 300
STATEN ISLAND NY 10310

SPRINT CORPORATION
JAY C KEITHLEY
LEON M KESTENBAUM
MICHAEL B FINGERHUT
1850 M STREET NW 11TH FLOOR
WASHINGTON DC 20036

SBC COMMUNICATIONS
ROBERT M. LYNCH
MICHAEL J. ZPEVAK
ROBERT J. GRYZMALA
ONE BELL CENTER, ROOM 3532
ST. LOUIS. MISSOURI 63101

EXCEL TELECOMMUNICATIONS INC
J CHRISTOPHER DANCE
VICE PRESIDENT LEGAL AFFAIRS
KERRY TASSOPOULOS
DIRECTOR OF GOVERNMENT AFFAIRS
9330 LBJ FREEWAY
SUITE 1220
DALLAS TEXAS 75243

THOMAS K CROWE
LAW OFFICES OF THOMAS K CROWE P.C.
COUNSEL FOR
EXCEL TELECOMMUNICATIONS INC
2300 M STREET NW
SUITE 800
WASHINGTON DC 20037

BRADLEY STILLMAN
COUNSEL FOR
CONSUMER FEDERATION OF AMERICA
1424 16TH ST NW SUITE 604
WASHINGTON DC 20036

CATHERINE R SLOAN
WORLDCOM INC
d/b/a LDDS WORLDCOM
1120 CONNECTICUT AVE NW
SUITE 400
WASHINGTON DC 20036

CHARLES C HUNTER
HUNTER & MOW PC
COUNSEL FOR TELECOMMUNICATIONS
RESELLERS ASSOCIATION
1620 I ST NW STE 701
WASHINGTON DC 20006

PETER ARTH, JR.
MARY MAC ADU
PEOPLE OF THE STATE OF CALIFORNIA AND
THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA
505 VAN NESS AVE
SAN FRANCISCO CA 94102

RANDOLPH J MAY
SUTHERLAND ASBILL & BRENNAN
COUNSEL FOR COMPUSERVE INC
1275 PENNSYLVANIA AVE NW
WASHINGTON DC 20004-2404

INTELCOM GROUP (USA) INC
CINDY Z SCHONHAUT
VICE PRESIDENT GOVERNMENT AFFAIRS
9605 EAST MAROON CIRCLE
ENGLEWOOD CO 80112

THE BELL ATLANTIC TELEPHONE
COMPANIES
LAWRENCE W KATZ
1320 NORTH COURT HOUSE ROAD
EIGHTH FLOOR
ARLINGTON VA 22201

AMERITECH
MICHAEL S PABIAN
2000 WEST AMERITECH CENTER DRIVE
RM 4H82
HOFFMAN ESTATES IL 60196

BELLSOUTH CORPORATION
M ROBERT SUTHERLAND
A KIRVEN GILBERT III
SUITE 1700
1155 PEACHTREE STREET NE
ATLANTA GA 30309-3610

AMERICAN PUBLIC COMMUNICATIONS
COUNCIL
ALBERT H KRAMER
ROBERT F ALDRICH
DICKSTEIN SHAPIRO & MORIN LLP
2101 L STREET NW
WASHINGTON DC 20554

ALBERT HALPRIN
HALPRIN TEMPLE GOODMAN & SUGRUE
COUNSEL FOR YELLOW PAGES PUBLISHERS ASSOC
1100 NEW YORK AVE NW STE 650E
WASHINGTON DC 20005

KATHYRN MARIE KRAUSE
U S WEST INC
1020 19TH ST NW STE 700
WASHINGTON DC 20036

DANNY E ADAMS
KELLEY DRYE & WARREN LLP
1200 NINETEENTH ST NW STE 500
WASHINGTON DC 20036

MARK C ROSENBLUM
AT&T CORP
295 NORTH MAPLE AVE RM 3245I1
BASKING RIDGE NJ 07920

GLEN S RABIN
FEDERAL REGULATORY COUNSEL
ALLTEL TELEPHONE SERVICES CORPORATION
655 15TH ST NW STE 200
WASHINGTON DC 20005

JUDITH ST LEDGER-ROTY
REED SMITH SHAW & MCCLAY
1301 K ST NW STE 1100 EAST TOWER
WASHINGTON DC 20005-3317

DENNIS C BROWN
BROWN AND SCHWANINGER
SMALL BUSINESS IN TELECOMMUNICATIONS
1835 K STREET NW STE 650
WASHINGTON DC 20006

CARL W NORTHROP
PAUL HASTINGS JANOFSKY & WALKER
COUNSEL FOR ARCH COMMUNICATIONS GROUP
1299 PENNSYLVANIA AVE NW 10TH FL
WASHINGTON DC 20004-2400

MARY MCDERMOTT
UNITED STATES TELEPHONE ASSOCIATION
1401 H ST NW STE 600
WASHINGTON DC 20005

ANDREW D LIPMAN
SWIDLER & BERLIN
COUNSEL FOR MFS COMMUNICATIONS CO
3000 K ST NW STE 300
WASHINGTON DC 20007

ITS INC
1231 20TH STREET
GROUND FLOOR
WASHINGTON, DC 20036

JANICE MYLES
FEDERAL COMMUNICATIONS COMMISSION
COMMON CARRIER BUREAU
1919 M STREET RM 544
WASHINGTON DC 20544

IRWIN A POPOWSKY
CONSUMER ADVOCATE
OFFICE OF ATTORNEY GENERAL
1425 STRAWBERRY SQUARE
HARRISBURG PA 17120

ANTHONY J GENOVESI
LEGISLATIVE OFFICE BLDG
ROOM 456
ALBANY NY 12248-0001

CHARLES H HELEIN
GENERAL COUNSEL
HELEIN & ASSOCIATES
COUNSEL FOR AMERICAS
TELECOMMUNICATIONS ASSOC
8180 GREENSBORO DR STE 700
MCCLEAN VA 22102

KENNETH RUST
DIRECTOR
NYNEX GOVERNMENT AFFAIRS
1300 I ST STE 400 W
WASHINGTON DC 20005

SAUL FISHER
NYNEX TELEPHONE COMPANIES
1095 AVENUE OF THE AMERICAS
NEW YORK NY 10036

THEODORE CASE WHITEHOUSE
WILLKIE FARR & GALLAGHER
COUNSEL FOR ASSOCIATION OF DIRECTORY
PUBLISHERS
1155 21ST ST NW
WASHINGTON DC 20036

DAVID L MEIER
DIRECTOR
CINCINNATI BELL TELEPHONE
201 E FOURTH ST
CINCINNATI OH 45201-2301

DAVID A GROSS
AIRTOUCH COMMUNICATIONS INC
1818 N STREET NW STE 800
WASHINGTON DC 20036

INFORMATION TECHNOLOGY ASSOCIATION
OF AMERICA
JOSEPH P MARKOSKI
MARC BEREJKA
SQUIRE SANDERS & DEMPSEY
1201 PENNSYLVANIA AVENUE NW
P O BOX 407
WASHINGTON DC 20044

MCI TELECOMMUNICATIONS CORPORATION
FRANK W KROGH
DONALD J ELARDO
1801 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20006

ELIZABETH H MCJIMSEY
ATTORNEY FOR SPRINT SPECTRUM LP
d/b/a SPRINT PCS
4900 MAIN ST 12TH FLOOR
KANSAS CITY MO 64112

PHILIP L MALET
JAMES M TALENS
STEPTOE & JOHNSON LLP
COUNSEL FOR IRIDIUM NORTH AMERICA
1330 CONNECTICUT AVE NW
WASHINGTON DC 20036

DANNY E ADAMS
STEVEN A AUGUSTINO
KELLEY DRYE & WARREN LLP
COUNSEL FOR ALARM INDUSTRY
COMMUNICATIONS COMMITTEE
1200 NINETEENTH ST NW STE 500
WASHINGTON DC 20036

JONATHAN E CANIS
KELLEY DRYE & WARREN LLP
COUNSEL FOR INTERMEDIA
COMMUNICATIONS INC
1200 NINETEENTH ST NW STE 500
WASHINGTON DC 20036

MICHAEL F ALTSCHUL
VICE PRESIDENT GENERAL COUNSEL
CELLULAR TELECOMMUNICATIONS
INDUSTRY ASSOCIATION
1250 CONNECTICUT AVE NW STE 200
WASHINGTON DC 20036